

Charles H Krumbein, (VSB NO 01234)
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE
POTOMAC PILE DRIVE LLC
DEBTOR

CASE NO 17-34078 KRH

PETER BARRETT, TRUSTEE
Plaintiff

ADV Pro- 19-03079 KRH

V
Robin McCormack,
Shoreline Service & Design LLC
Brad Martin
Potomac Pile Driver LLC
APD3 LLC and
Jacob Lillard

Defendants

NOTICE OF MOTION TO WITHDRAW REPRESENTATION

PLEASE TAKE NOTICE THAT the following document was filed with the Court: Motion TO WITHDRAW REPRESENTATION.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before April 15, 2020, you or your attorney must:

1. File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so that the court will receive it **before** the deadline shown above. Mail your objection or comments to:

(1) Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

YOU MUST ALSO:

2. Mail a copy to:
Charles H Krumbein, Esq.
Krumbein & Associates, PLLC
1650 Willow Lawn Dr STE 201
Richmond, Va 23230

3. Attend a hearing on April 15, 2020 at 12:00PM at 701 East Broad Street, Courtroom 5000, Richmond, VA 23219. You must attend the hearing in addition to filing a written objection to the Motion. If you fail to file timely a written response or attend the hearing, the Court may consider any objection you may have waived and award the relief requested.

Date: April 1, 2020

/S/ Charles H Krumbein
Charles H Krumbein, (VSB NO 01234)
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Richmond, Va 23230
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Certificate of Service

This day the undersigned certifies that a true copy of this Motion to Withdraw Representation was sent by CM/ECF and delivered to the Movant Peter Barrett and Jeremy Williams. February 28, 2020, and Robin McCormack and Shoreline Service & Design LLC.

/S/ Charles H Krumbein
Charles H Krumbein, Esq.

By first class US Mail
Robin McCormack, and
Shoreline Services and Design, LLC.
214 Marshall Ave
Colonial Beach Va 22443

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Motion to Withdraw Representation

This day comes Charles H Krumbein, Counsel of record for Robin McCormack and her corporation Shoreline Service & Design LLC and moves this court to allow said counsel to withdraw his representation of these parties.

Counsel and his clients have irreconcilable differences and to the conduct of this representation such that Counsel is unable to complete his responsibilities.

Accordingly ,Counsel preys that this court allow Counsel be allow to withdraw as representative of these parties in this matter before the court.

Date: April 1, 2020

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Charles H Krumbein, Esq.

Served By US Mail
Robin McCormack, and
Shoreline Services and Design, LLC.
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